Case 5:06-cv-03359-JF Document 233 Filed 05/04/09 Page 1 of 4

1 2 3 4 5 6 7	William S. Klein (State Bar No. 121792) wklein@hopkinscarley.com Robert A. Christopher (State Bar No. 89035) rchristopher@hopkinscarley.com Eugene Ashley (State Bar No. 171885) eashley@hopkinscarley.com Noelle R. Dunn (State Bar No. 226913) ndunn@hopkinscarley.com HOPKINS & CARLEY A Law Corporation The Letitia Building 70 South First Street San Jose, CA 95113-2406	*E-Filed 5/4/09*
8 9 10	mailing address: P.O. Box 1469 San Jose, CA 95109-1469 Telephone: (408) 286-9800 Facsimile: (408) 998-4790	
1112	Attorneys for Plaintiff/Defendant/Third-Party Plaintiff GLASFORMS, INC., a California corporation	
13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRICT OF CALIFORNIA	
15	SAN JOSE DIVISION	
16	DONG AH TIRE & RUBBER CO., LTD., a Korean Corporation,	CASE NO. C 06-03359 JF (Consolidated With Case No. C 06-00213 JF)
17	Plaintiff,	STIPULATION AS TO FURTHER
18	v.	BRIEFING ON GLASFORMS' MOTION TO COMPEL; [PROPOSED] ORDER
19	GLASFORMS, INC., a California	10 0001122, [11010522] 01221
20	Corporation,	
21 22	Plaintiff/Defendant/ Third-Party Plaintiff.	
23	v.	
24	CTG INTERNATIONAL (NORTH	
25	AMERICA) INC., an Indiana Corporation; TAISHAN FIBERGLASS, INC., a	
26	corporation organized under the laws of the People's Republic of China,	
27	Defendants/Third-Party Defendants.	
28 LEY		
w	597\636280.1	

HOPKINS & CARLEY
ATTORNEYS AT LAW
SAN JOSE

Case 5:06-cv-03359-JF Document 233 Filed 05/04/09 Page 2 of 4

1	This stipulation is entered into between Plaintiff/Defendant/Third-Party Plaintiff
2	Glasforms, Inc. ("Glasforms") and Third-Party Defendant Taishan Fiberglass, Inc. ("Taishan"),
3	by and through their respective counsel of record.
4	RECITALS
5	WHEREAS, Glasforms and Taishan (collectively the "Parties") executed and filed a
6	stipulation to reschedule further briefing on Glasforms' Motion to Compel Further Responses by
7	Taishan to Request for Production of Documents and Things, Sets Four and Five ("Motion to
8	Compel") on April 9, 2009;
9	WHEREAS, the Court on April 10, 2009 issued an order, based on the Parties' stipulation,
10	that required supplemental briefs regarding Glasforms' Motion to Compel to be filed by each
11	party, jointly or separately, by May 1, 2009;
12	WHEREAS, as directed by the Court, counsel for the Parties have met and conferred in
13	good faith to resolve the issues that are the subject of the Motion to Compel;
14	WHEREAS, on April 8, 2009, Taishan produced several Chinese language documents
15	pursuant to the Parties' meet and confer efforts;
16	WHEREAS, Glasforms has translated these recently-produced documents, and seeks
17	additional information about them from Taishan;
18	WHEREAS, the Parties believe that additional time may allow them to reach a mutually
19	satisfactory arrangement as to the remaining request for production;
20	NOW THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE, subject to
21	Court approval, that the time within which Supplemental brief(s) regarding Glasforms' Motion to
22	///
23	///
24	///
25	///
26	///
27	///
28	///
RLEY	597\636280.1 - 2 -

HOPKINS & CARLEY
ATTORNEYS AT LAW
SAN JOSE

Case 5:06-cv-03359-JF Document 233 Filed 05/04/09 Page 3 of 4

1	Compel shall be filed by Glasforms and Taishan, jointly or separately, be enlarged to and		
2	including May 15, 2009.		
3	IT IS SO STIPULATED:		
4			
5	Dated: May, 2009	BAKER & DANIELS LLP	
6			
7		By: /s/ April Sellers	
8		David K. Herzog Kevin M. Toner	
9		April Sellers Jennifer M. Phelps	
10		Attorneys for Third-Party Defendants TAISHAN FIBERGLASS INC and CTG INTERNATIONAL (NORTH AMERICA)	
11		INC.	
12	Dated: May, 2009	HOPKINS & CARLEY A Law Corporation	
13			
14		By: /s/ Noelle R. Dunn	
15		Noelle R. Dunn Attorneys for Plaintiff/Defendant/	
16 17		Third-Party Plaintiff GLASFORMS, INC., a California corporation	
18	IT IS ORDERED that:		
19	Supplemental brief(s) regarding Glasfor	rms' Motion to Compel shall be filed by Glasforms	
20	and Taishan, jointly or separately, by May 15	, 2009.	
21		~ 1101	
22	Dated: May, 2009	Jan Sel	
23		HONORABLE RICHARD SEEBORG Magistrate Judge, United States District Court	
24			
25			
26			
27			
28			
HOPKINS & CARLEY ATTORNEYS AT LAW	597\636280.1	- 3 -	

STIPULATION AS TO FURTHER BRIEFING ON GLASFORMS' MOTION TO COMPEL; [PROPOSED] ORDER

C 06-03359 JF

SAN JOSE

1	CERTIFICATE OF SERVICE		
2	I certify that on May 1, 2009, the foregoing STIPULATION AS TO FURTHER		
3	BRIEFING ON GLASFORMS' MOTION TO COMPEL; [PROPOSED] ORDER was filed		
4	electronically. Notice of this filing will be sent to the following parties by operation of the		
5	Court's electronic filing system. Parties may access this filing through the Court's system.		
6	William S. Klein		
7	Robert A. Christopher Eugene Ashley		
8	Noelle R. Dunn HOPKINS & CARLEY		
9	A Law Corporation 70 South First Street		
10	San Jose, CA 95113 Telephone: (408) 286-9800		
11	Attorneys for Plaintiff/Defendant/Third-Party		
12	Plaintiff GLASFORMS, INC.		
13	/a / Diona I Hadaaa		
14	/ s / Diana L. Hodges		
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28 Arley			
	597\636280.1		